

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
	)	
W. R. GRACE & CO., et al., <sup>1</sup>	)	Case No. 01-01139 (KJC)
	)	(Jointly Administered)
Reorganized Debtors.	)	
	)	Re: Docket Nos. 31812, 31856, 31873, 32044, 32068, 32233, 32324, 32503, 32560, 32570, 32571

**CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING  
AMENDED STIPULATION FOR BRIEFING SCHEDULE AND HEARING DATE  
FOR ANDERSON MEMORIAL HOSPITAL'S MOTION TO ALTER  
OR AMEND ORDER DENYING MOTION FOR CLASS CERTIFICATION**

1. On March 5, 2014, Anderson Memorial Hospital ("AMH") filed its Motion to Alter or Amend Order Denying Motion for Class Certification and for Entry of Scheduling Order and Granting Related Relief (the "Motion") [Docket No. 31812]<sup>2</sup>.
2. On March 18, 2014, the Court entered the Order Approving Stipulation for Briefing Schedule and Hearing Date for Anderson Memorial Hospital's Motion to Alter or Amend Order Denying Motion for Class Certification (the "Order") [Docket No. 31873].
3. On October 6, 2014, the Court entered the Amended Order Approving Stipulation for Briefing Schedule and Hearing Date for Anderson Memorial Hospital's Motion to Alter or Amend Order Denying Motion for Class Certification (the "Order") [Docket No. 32417].

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<sup>1</sup> The Reorganized Debtors are W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.) and W. R. Grace & Co.-Conn. At the time of filing of AMH's Motion, there were 62 debtors. On March 19, 2014, Grace filed and the Court entered a Final Decree which, *inter alia*, closed the Chapter 11 cases of certain Merged Subsidiaries. [Docket No. 31880] On September 16, 2014, Grace filed a motion closing the Chapter 11 cases of certain additional Grace subsidiaries, and on October 14, 2014, the Court entered a Final Decree which, *inter alia*, closed the Chapter 11 cases of certain Grace subsidiaries. [Docket No. 32429] Accordingly, Grace and Grace-Conn. are the surviving Reorganized Debtors.

<sup>2</sup> Capitalized terms not defined herein shall have the meaning ascribed to them in the Motion.

4. On April 15, 2015, a hearing on the Motion was held. On May 5, 2015, the Court entered the Order Regarding Anderson Memorial Hospital's Discovery Request and directing the parties to submit a proposed scheduling order regarding the filing of briefs on the issue of class certification [Docket No. 32560].

5. Reorganized Debtors W. R. Grace & Co., et al. and AMH entered into a Stipulation for Briefing Schedule and Hearing Date for Anderson Memorial Hospital's Motion to Alter or Amend Order Denying Motion for Class Certification (the "Stipulation"). Among other things, the Stipulation gives relief from the page limitations found in Local Rule 7007-2.

6. On June 8, 2015, the Court entered an order approving the Stipulation [Docket No. 32571].

7. Due to a medical emergency, counsel for AMH has requested an adjustment to the schedule to file the opening brief. The parties consent to adjust the briefing schedule so that AMH's opening brief will now be due within ninety (90) days of June 8, 2015 and the Reorganized Debtors will submit their responsive brief within ninety (90) days of filing of AMH's opening brief.

8. Attached hereto as Exhibit A is a copy of a proposed form of Order Approving the Amended Stipulation for Briefing Schedule and Hearing Date for Anderson Memorial Hospital's Motion to Alter or Amend Order Denying Motion for Class Certification (the "Order"). A copy of the Amended Stipulation is attached to the Order as Exhibit 1 thereto.

9. By way of this certification, the Reorganized Debtors respectfully request that the Court enter the Order if acceptable to the Court, thereby approving the terms of the Amended Stipulation.

10. Counsel for the parties are available, should the Court have any questions or concerns with the foregoing or the proposed Order.

Dated: August 24, 2015

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